

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TRUE RETURN SYSTEMS LLC,

Plaintiff,

v.

MAKERDAO,

Defendant.

Case No. 1:22-cv-08478-VSB

**DECLARATION OF DAVID A. BOAG IN SUPPORT OF
PLAINTIFF'S MOTION FOR A DEFAULT JUDGMENT**

I, David A. Boag, declare as follows:

1. I am over the age of 18 and a member in good standing of the State Bar of New York and certified to practice before this Court.

2. I am the principal of Boag Law, PLLC, counsel of record for plaintiff True Return Systems, LLC ("TRS" or "Plaintiff").

3. I make this declaration based upon personal knowledge, and I could and would competently testify to the facts stated herein if called to do so.

4. Exhibit A is a true and correct copy of a screen printout from <<https://vote.makerdao.com/terms>>, which was retrieved on February 2, 2023.

5. Exhibit B is a true and correct copy of a screen printout from <https://www.dfs.ny.gov/virtual_currency_businesses>, which was retrieved on February 2, 2023.

6. Exhibit C is a true and correct copy of a screen printout from <<https://cointelegraph.com/news/are-there-too-many-cryptocurrencies>>, which was retrieved on February 3, 2023.

7. Exhibit D is a true and correct copy of a screen printout from <<https://forum.makerdao.com/t/gusd-makerdao-partnership-update/19428>>, which was retrieved on February 2, 2023.

8. Exhibit E is a true and correct copy of “Track One request Granted,” which was retrieved from <<https://patentcenter.uspto.gov/applications/15923317/ifw/docs>> on February 2, 2023.

9. Exhibit F is a true and correct copy of “Notice of Allowance and Fees Due,” which was retrieved from <<https://patentcenter.uspto.gov/applications/15923317/ifw/docs>> on February 2, 2023.

10. Exhibit G is a true and correct copy of a screen printout from <<https://www.linkedin.com/pulse/what-blockchain-ledger-technology-can-do-exchange-traded-jack-fonss/>>, which was retrieved on February 2, 2023.

11. Exhibit H is a true and correct copy of a screen printout from <<https://forum.makerdao.com/t/mip40c3-sp67-modify-core-unit-budget-strategic-happiness-sh-001/13805>>, which was retrieved on February 5, 2023.

12. Exhibit I is a true and correct copy of a screen printout from <<https://forum.makerdao.com/t/mip39c2-sp11-strategic-happiness-core-unit/8006>>, which was retrieved on February 5, 2023.

13. Exhibit J is a true and correct copy of a screen printout from <<https://forum.makerdao.com/t/discussion-the-dao-needs-a-serious-discussion-about-legal-structure/10764>>, which was retrieved on February 5, 2023.

14. Exhibit K is a true and correct copy of download from <[https://dune.com/SebVentures/maker - - - accounting_1](https://dune.com/SebVentures/maker---accounting_1)>, which was retrieved on December 4, 2022.

15. Exhibit L is a true and correct copy of a download from <[https://dune.com/SebVentures/maker - - - accounting_1](https://dune.com/SebVentures/maker---accounting_1)>, which was retrieved on December 4, 2022.

16. Exhibit M is a true and correct copy of a screen printout from <https://cdn.ymaws.com/members.lesusacanada.org/resource/collection/D8145BC5-DBCC-4F8F-8B68-593C0B0D4776/2021_Royalty_Rate_&_Deal_Terms_Executive_Summary.pdf>, which was retrieved on February 3, 2023.

17. Exhibit N is a true and correct copy of a screen printout from <<https://www.inquartik.com/blog/patent-licensing-a-closer-look-part-2/>>, which was retrieved on February 2, 2023.

18. Exhibit O is a true and correct copy of a screen printout from <<https://www.upcounsel.com/patent-licensing-royalty-rates>>, which was retrieved on February 2, 2023.

19. Exhibit P is a true and correct copy of a screen printout of the Dai Foundation and indication of Mr. Samarghandi as a Dai board member from <<https://cvrapi.dk/virksomhed/dk/dai-fonden/40645799>> retrieved on February 13, 2023, and attached is the original email from Mr. Samarghandi which was received on December 15, 2022.

20. Exhibit Q is a true and correct copy of a screen printout from <<https://www.jdsupra.com/legalnews/how-much-is-your-invention-worth-or-how-4861877/>>, which was retrieved on February 3, 2023.

21. Exhibit R is a true and correct copy of a screen printout from <<https://forum.makerdao.com/t/infringement-of-trss-u-s-patent-no-10-025-797-by-makerdao/16583>>, which was retrieved on February 5, 2023. As of this Declaration, the post had approximately 1,100 views and 11 replies.

22. Exhibit S is a true and correct copy of a screen printout from <<https://twitter.com/BOAGIP/status/1547348049130930176>>, which was retrieved on February 3, 2023.

23. Exhibit T is a true and correct copy of a screen printout from <<https://forum.makerdao.com/t/dai-foundation-position-on-patent-infringement-complaints-against-makerdao/17112>>, which was retrieved on February 4, 2023.

24. Exhibit U is a true and correct copy of a screen printout from <<https://twitter.com/InventFi/status/1501974327381667844> >, which was retrieved on February 3, 2023. As of this Declaration, the post had more than 7,250 impressions and 150 engagements.

25. Exhibit V is a true and correct copy of a screen printout from <<https://forum.makerdao.com/t/re-makerdaos-use-of-u-s-patent-no-10-025-797-method-and-system-for-separating-storage-and-process-of-a-computerized-ledger-for-improved-function/13822>>, which was retrieved on February 5, 2023. As of this Declaration, the post had more than 1,200 views and 8 replies.

26. Exhibit W is a true and correct copy of a screen printout from <<https://forum.makerdao.com/t/mip84-activate-protocol-owned-vault-emulation/17713/48>>, which was retrieved on February 5, 2023.

27. Exhibit X is a true and correct copy of a screen printout from <<https://forum.makerdao.com/t/daif-cu-update-q4-2022/19522>>, which was retrieved on February 2, 2023.

28. Exhibit Y is a true and correct copy of a screen printout from <<https://defillama.com/protocol/makerdao>>, and selecting the date December 31, 2021, from the graphic, which was retrieved on February 3, 2023.

29. Exhibit Z is a true and correct copy of a screen printout from <<https://www.federalreserve.gov/releases/lbr/20211231/default.htm>>, which was retrieved on February 3, 2023.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED this 13th day of February, 2023.


David A. Boag